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Attorney for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ELISEO NAPOLES, MARIE NAPOLES
AND M.N., A MINOR, BY AND
THROUGH HIS GUARDIAN AD LITEM.

CASE NO: 2:19-cv-01474-APG-BNW

Plaintiffs,

VS.

CLARK COUNTY SCHOOL DISTRICT,
DOES I through X, inclusive; ROE
CORPORATIONS I through X, inclusive

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES
(First Request)**

Defendant.

COMES NOW, Plaintiffs, ELISEO NAPOLES, MARIE NAPOLES AND M.N., A MINOR, BY AND THROUGH HIS GUARDIAN AD LITEM (hereinafter, "Plaintiffs"), by and through their counsel, the law firm of Hatfield & Associates, Ltd., and Defendant CLARK COUNTY SCHOOL DISTRICT (hereinafter "Defendant"), by and through its counsel, Phoebe V. Redmond, Esq., and Crystal J. Herrera, Esq., of the Clark County School District Office of the General Counsel, do hereby stipulate and agree to extend the discovery deadlines sixty (60) days pursuant to LR IA 6-1 and LR 26-4 for the reasons provided below. A Joint Stipulated Discovery Plan and Scheduling Order pursuant to FRCP 26(f) and LR 26.1-e was entered on January 30, 2020. (ECF No. 11). This is the first request for an extension of discovery deadlines.

1 Discovery closes on June 16, 2020. The last day to file Dispositive Motions is July 16,
2 2020.

3 **1. DISCOVERY COMPLETED TO DATE:**

4 A. Plaintiffs served Initial Disclosures on Defendant on January 24, 2020.
5 Defendant served Initial Disclosures on Plaintiffs on January 27, 2020.

6 B. Plaintiffs have provided Defendant with Medical Record Release Authorizations.

7 **2. DISCOVERY YET TO BE COMPLETED:**

8 A. Plaintiffs intend to propound written discovery to Defendant, and take the
9 depositions of fact and expert witnesses.

10 B. Defendant intends to propound written discovery to Plaintiffs, and take the
11 depositions of fact and expert witnesses.

12 **3. REASONS DISCOVERY COULD NOT BE COMPLETED WITHIN THE**
13 **EXISTING DEADLINE.**

14 There has been a harsh turn of events in the nation since discovery commenced in this case.
15 The COVID-19 pandemic has caused many businesses to close and individuals to self-quarantine.
16 Currently, all non-essential businesses in the State of Nevada are closed for a minimum of thirty
17 (30) days. This holding pattern is rendering it problematic for the parties to safely and effectively
18 conduct discovery in this case. Indeed, in-person depositions cannot reasonably be scheduled or
19 taken in the next 30 days and the parties have agreed to defer written discovery during this time.
20 In order to allow for the parties to complete the remaining discovery provided above, the parties
21 respectfully request that the discovery deadlines in this matter be extended sixty (60) days. This is
22 the first request for an extension, which is made in good faith and not for the purposes of delay.

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1 **4. PROPOSED SCHEDULE FOR COMPLETING DISCOVERY AND OTHER**
2 **DISCOVERY DEADLINES.**

3 A. On January 30, 2019, this Court ordered that the last date to complete discovery
4 would be June 16, 2020, that the last day to file dispositive motions would be July 16, 2020, and
5 that the last day to file a pretrial order would be August 14, 2020. The parties stipulate and agree
6 to a proposed sixty (60) day stay of discovery plus the following proposed rescheduled discovery
7 dates:
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9 **Summary of Proposed Changes**

	Current Deadline	Revised Deadline
Close of Discovery	June 16, 2020	August 17, 2020
Interim Status Report	April 17, 2020	June 18, 2020
Disclosure of Experts and Expert Reports	April 17, 2020	June 18, 2020
Disclosure of Rebuttal Experts and their reports	May 18, 2020	July 17, 2020
Dispositive Motions	July 16, 2020	September 16, 2020
Pretrial Order	August 14, 2020	October 16, 2020 (If dispositive motions are filed, 30 days after the entry of the court's ruling on said motion)

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2 Dated: March 27, 2020

3 HATFIELD & ASSOCIATES, LTD.

4 /s/ *Trevor J. Hatfield*
5 By: _____
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9 Attorney for Plaintiff

Dated: March 27, 2020

CLARK COUNTY SCHOOL DISTRICT
OFFICE OF THE GENERAL COUNSEL

10 /s/ *Crystal J. Herrera*
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13 Attorneys for Clark County School District

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16 IT IS SO ORDERED.

17 DATED this 30th day of March, 2020.

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U.S. MAGISTRATE JUDGE